## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH DAKOTA CENTRAL DIVISION

UNITED STATES OF AMERICA,

3:19-CR-30047-RAL

Plaintiff,

VS.

MOTION FOR FURLOUGH TO ATTEND COURT

ANDREA CIRCLE BEAR, a/k/a Andrea High Bear,

Defendant.

COMES NOW the Defendant, Andrea Circle Bear, by and through her attorney, A. Jason Rumpca of Riter Rogers, LLP, and respectfully moves this Court for an Order Authorizing a Furlough to Attend Court. In support of said motion, Defendant submits the following:

- 1. Defendant is currently in the custody of the United States Marshal Service, held at the Hughes County Jail, Pierre, South Dakota while she awaits sentencing on a federal charge of Maintaining a Drug Involved Premises in violation of 21 U.S.C. §§ 856(a)(1) and 856(b).
- 2. Sentencing is scheduled for December 30, 2019 at 11:00 a.m.
- Defendant is requesting a Furlough to attend Civil Court at the Cheyenne River Sioux
   Tribal Court in Eagle Butte, South Dakota on November 20, 2019 at 9:00 a.m.

   (Mountain). The court hearing is related to her pending divorce action.
- 4. Defendant is requesting a 24-hour furlough to begin at 5:00 p.m. (Central) on November 19, 2019, returning back to the United States Marshal Services custody at the to the Hughes County Jail at 5:00 p.m. (Central) on November 20, 2019.
- 5. Defendant's grandmother, Clara LeBeau, will provide transportation should the Court

grant the Motion for Furlough.

- A copy of the Notice of Civil Action has been provided to the United States
   Attorney's Office and the United States Probation Office.
- 7. The Government has no objection to this request.

Respectfully submitted this 15<sup>th</sup> day of November, 2019.

## RITER ROGERS, LLP

By: /s/ A. Jason Rumpca

A. Jason Rumpca
Attorney for Defendant
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Pierre, South Dakota 57501

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## **CERTIFICATE OF SERVICE**

I, A. Jason Rumpca, certify that a true and correct copy of Motion for Furlough to Attend Court was served electronically upon the following:

Cameron Cook
U.S. Attorney's Office
225 South Pierre Street, Suite 337
Pierre, SD 57501
cameron.cook@usdoj.gov

Dated this 15<sup>th</sup> day of November, 2019.

## RITER ROGERS, LLP

By: /s/ A. Jason Rumpca

A. Jason Rumpca Attorney for Defendant